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7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 RUBEN MARTIN COVARRUBIAS-GUERRA,

14 Defendant.

15 Case No. 2:20-cr-00319-JCM-EJY

16 **STIPULATION TO CONTINUE**
SENTENCING HEARING
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Edward G. Veronda, Assistant United States Attorney,
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
20 and Navid Afshar, Assistant Federal Public Defender, counsel for Ruben Martin Covarrubias-
Guerra, that the Sentencing Hearing currently scheduled on April 15, 2022, be vacated and
21 continued to a date and time convenient to the Court, but no sooner than ninety (90) days.
22

23 This Stipulation is entered into for the following reasons:

24 1. Mr. Covarrubias's family has sent in numerous letters that require translation
from Spanish to English and more time is needed to translate as additional letters are expected.

25 2. Additionally, counsel is still weighing whether to employ an expert for Mr.
26 Covarrubias's sentencing hearing.

1 3. To coordinate schedules with both parties, we ask for no less than 60 days but
2 preferably 90 due to upcoming trials, and other matters that conflict with counsel's respective
3 schedules.

4 4. The defendant is in custody and agrees with the need for the continuance.

5 5. The parties agree to the continuance.

6 This is the second request for a continuance of the sentencing hearing.

7 DATED this 6th day of April, 2022.

8
9 RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

11 By /s/ Navid Afshar
12 NAVID AFSHAR
13 Assistant Federal Public Defender

By /s/ Edward G. Veronda
EDWARD G. VERONDA
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

RUBEN MARTIN COVARRUBIAS-GUERRA,

Defendant.

Case No. 2:20-cr-00319-JCM-EJY

ORDER

IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for
y, April 15, 2022 at 10:00 a.m., be vacated and continued to **July 15, 2022, at 10:00**

DATED April 8, 2022.

UNITED STATES DISTRICT JUDGE